

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

Jonathan Paul Catlin

Plaintiff

vs.

Viking Client Services, Inc.

and

Trans Union Consumer Services, LLC

Defendants

CASE NO. 15 cv 6258

JUDGE: Hon. David G. Larimer

MAGISTRATE JUDGE:

Hon. Jonathan W Feldman

PROPOSED DISCOVERY PLAN

After conferring as directed by FRCP 26(f), we submit the following Proposed Discovery Plan:

1. The parties do not unanimously consent to Magistrate Judge jurisdiction for disposition of this case.
2. All mandatory disclosure requirements found in Rule 26(a)(1) of the Federal Rules of Civil Procedure, as well as any objections to the mandatory disclosure requirements shall be completed on or before **August 7, 2015**.
3. All motions to join other parties and to amend the pleadings shall be filed on or before **November 25, 2015**. Any third party action shall be commenced on or before **November 25, 2015**.
4. All fact discovery in this case, including depositions, shall be completed on or before **March 12, 2016**. All motions to compel discovery shall be filed at least thirty (30) days prior to the fact discovery cutoff.

5. Plaintiff shall identify any expert witnesses and provide reports in compliance with FRCP 26(a)(2) by **December 11, 2015**. Defendants shall identify any expert witnesses and provide reports in compliance with FRCP 26(a)(2) by **January 11, 2016**. Parties shall complete all discovery relating to experts, including depositions, by **March 12, 2016**.
6. Discovery shall be conducted in compliance with the rules set forth in Local Rule 26 (General Rules Governing Discovery), Local Rule 30 (oral depositions), FRCP 33 (interrogatories practice), FRCP 34 (document requests), and FRCP 36 (requests for admission). The parties will provide the Court with a Stipulated Protective Order, should the parties agree on the need for such a document.
7. Pursuant to Local Rule 30(f), the parties do not believe that this case is suitable for electronic discovery, but are amenable to the production of any electronically stored information in hard copy as an initial matter. Once the parties have had the opportunity to review such documents, they agree, if necessary, to confer regarding any additional exchange or production.
8. Because this case involves a pro se plaintiff, all discovery materials will be filed with the Court in accordance with Local Rule 5.2(f).
9. Dispositive motions, if any, shall be filed no later than **May 13, 2016**.
10. Responding papers are due by **June 13, 2016**.
11. Reply papers, if any, shall be filed by **June 27, 2016**.
12. This case has been automatically referred for the Alternative Dispute Resolution (ADR) Program. As such, the parties will participate in the ADR process as follows:
 - a. No later than **August 24, 2015**, the parties shall confer and select a mediator, confirm the mediator's availability, ensure that the mediator does not have a conflict with any of the parties in the case, identify a date and time for the initial mediation session, and file a stipulation confirming their selection on the form provided by the Court.
 - b. Any motions to opt out of the ADR process shall be filed by **August 10, 2015**.
 - c. The initial mediation session shall be held no later than **October 27, 2015**.

13. Jury trial has been requested in this case. Currently, the parties estimate that the trial may take up to 3 days.

Dated: July 20, 2015

/s/ Jonathan Paul Catlin (w/ consent)

Jonathan Paul Catlin

Pro Se Plaintiff

Email: myfriendstenthousand@gmail.com

Post Office Box 621

Naples, New York [14512]

Cell: 208-627-3950

/s/ Arthur Sanders (w/ consent)

Arthur Sanders, Esq.

Email: asanders@arthursanderslaw.com

30 South Main Street

New City, New York 10956

845-499-2990

Fax: 845-499-2992

Attorney for

Defendant Viking Client Services, Inc.

/s/ William M. Huse

Robert J. Schuckit, Esq.

William R. Brown, Esq.

William M. Huse, Esq.

Email: rschuckit@schuckitlaw.com

wbrown@schuckitlaw.com

whuse@schuckitlaw.com

4545 Northwestern Drive

Zionville, Indiana 46077

317-363-2400

Fax: 317-363-2257

Attorneys for Defendant Trans Union, LLC